Honorable Robert S. Lasnik 1 2 3 4 5 6 UNITED STATES DISTRICT COURT 7 WESTERN DISTRICT OF WASHINGTON AT SEATTLE 8 9 ELSTER SOLUTIONS, LLC., a Delaware Case No. 2:16-cy-00771 RSL Limited Liability company, 10 STIPULATION AND PROPOSED ORDER Plaintiff, FOR FURTHER EXTENSION OF TIME 11 TO ANSWER COMPLAINT V. 12 THE CITY OF SEATTLE, a municipal corporation; SEATTLE CITY LIGHT, a 13 publicly owned utility, MUCKROCK FOUNDATION, INC., a Massachusetts 14 corporation; and PHIL MOCEK, an individual 15 Defendants. 16 After stipulation by the parties, this Court extended Defendant MuckRock Foundation 17 Inc.'s (MuckRock) time to answer the complaint to July 19, 2016. However, Plaintiff is willing 18 to extend MuckRock's time to answer for another 60 days (September 19, 2016), or 30 days 19 from receiving written notice from this Court that it has completed *in camera* review, whichever 20 occurs first. 21 Accordingly, the parties stipulate that Defendant MuckRock's answer shall be due on 22 September 19, 2016, or 30 days from receiving written notice from this Court that it has 23 completed in camera review, whichever occurs first. 24 Dated this 13th day of July, 2016. Respectfully Submitted, 25 FOCAL PLLC 26 By: s/ Venkat Balasubramani 27 focal PLLC STIPULATION AND PROPOSED ORDER FOR FURTHER 900 1st Ave. S., Suite 203 EXTENSION OF TIME TO ANSWER COMPLAINT

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Seattle, Washington 98134 telephone (206) 529-4827 fax (206) 260-3966

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Venkat Balasubramani, WSBA #28269 1 900 1st Avenue S., Suite 203 Seattle, Washington 98134 2 Tel: (206) 529-4827 Fax: (206) 260-3966 3 Email: venkat@focallaw.com 4 Attorney for Defendant MuckRock 5 Foundation, Inc. 6 7 GORDON & REES LLP 8 By: *s/John Leary* John Leary, WSBA #36345 9 Allen Estes, WSBA #34526 701 Fifth Avenue, Suite 2100 10 Seattle, WA 98104 Tel: (206) 695-5100 11 Fax: (206) 689-2822 12 Email: aestes@gordonrees.com Email: jleary@gordonrees.com 13 Attorneys for Plaintiff Elster Solutions, LLC 14 15 16 17 18 19 20 21 22 23 24 25 26 27

1 [PROPOSED] ORDER GRANTING STIPULATION FOR FURTHER EXTENSION OF 2 TIME TO ANSWER COMPLAINT Having considered the parties' Stipulation For Further Extension of Time to Answer 3 Complaint, IT IS HEREBY ORDERED that the Defendant MuckRock Foundation, Inc.'s answer 4 shall be due on or before September 19, 2016, or 30 days from receiving written notice from this 5 Court that it has completed *in camera* review, whichever occurs first. 6 7 Dated U.S. District Court Judge 8 9 10 Presented by: 11 FOCAL PLLC Venkat Balasubramani, WSBA #28269 12 900 1st Avenue S., Suite 203 Seattle, Washington 98134 13 Tel: (206) 529-4827 Fax: (206) 260-3966 14 Email: venkat@focallaw.com 15 Attorney for Defendant MuckRock 16 Foundation, Inc. 17 18 GORDON & REES LLC John Leary, WSBA #36345 19 Allen Estes, WSBA #34526 701 Fifth Avenue, Suite 2100 20 Seattle, WA 98104 21 Tel: (206) 695-5100 Fax: (206) 689-2822 22 Email: jleary@gordonrees.com Email: aestes@gordonrees.com 23 Attorneys for Plaintiff Elster Solutions, LLC 24 25 26 27

focal PLLC